UTAH DIVISION OF SOLID AND HAZARDOUS WASTE
USED OIL TRANSFER FACILITY PERMIT

ABSTRACT: ***Safety-Kleen Systems, Inc. (Safety-Kleen) operates a used oil railcar transfer facility located at 300 South 2650 West (formerly Monterey Road), Salt Lake City, Utah, where it stores used oil in railcars. Safety-Kleen transfers used oil between trucks and rail cars at this site prior to shipping the used oil to other facilities for processing. This permit allows Safety-Kleen to store used oil at this site in up to three railcars with a capacity of 27,000 gallons each for periods not exceeding 35 days. Safety-Kleen was originally approved to operate at this location on August 1, 1979, and store used oil in two railcars and one 55-gallon drum. A request to modify the original permit was initially received by the Division on September 24, 2007, with subsequent application material received through December 2008.***

PERMITTEE NAME:	Safety-Kleen Systems, Inc.
PERMITTEE MAILING ADDRESS:	5360 Legacy Drive, Building 2, Suite # 100 Plano, TX 75024
PERMITTEE CONTACT:	Randy Shaner, EHS Manager Cell: (402) 630-4261 Fax: (703) 783-8634 E-Mail: randy.shaner@safety-kleen.com
TRANSFER FACILITY PHYSICAL ADDRESS:	300 South 2650 West Salt Lake City, UT 84104
TRANSFER FACILITY MAILING ADDRESS:	1066 S Pioneer Road Salt Lake City, UT 84104
TRANSFER FACILITY CONTACT:	Mike Blanchard, Branch Manager Phone: (801) 975-0742 Fax: (801) 972-6882
PERMIT #:	UOP-0051
EPA I.D. #:	UTR000006502

By this permit to operate, Safety-Kleen Systems, Inc. (hereafter referred to as Permittee) shall be subject to the following conditions:

1. General.

The Permittee shall transport, store and manage used oil in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) and of the Used Oil Management Act (The Act), 19-6-701 et seq, Utah Code Annotated.

2. Permit Revocation.

Any noncompliance with the permit or the UAC or the Act, other than activities authorized by a variance granted by the Executive Secretary of the Utah Solid and Hazardous Waste Control Board (Executive Secretary), constitutes a violation and may be grounds for enforcement action or permit revocation.

3. Permit Modifications.

a. Modifications to this permit shall only be authorized by the Executive Secretary.
b. The Executive Secretary may make modifications as necessary, or as a result of statutory or regulatory changes.
c. If the Permittee wishes to request modifications to any item or activity covered by this permit, the Permittee shall submit a written permit modification request to the Executive Secretary. If the Executive Secretary determines any modification request is substantive, a public hearing, a 15-day public comment period or both may be required before the modifications are approved.
d. Implementing modifications, other than those submitted to meet the requirements of R315-15-13.4(e), prior to the Executive Secretary's approval constitutes a violation of the permit and may be grounds for enforcement action or permit revocation.

4. Used Oil Operations.

a. The Permittee shall transfer, store, and manage used oil in the manner and following the methods and procedures described in the attachments to this permit. This permit does not cover used oil generated by the Permittee at this location.
b. The Permittee shall not store used oil from its customers at this transfer facility for more than 35 days without first obtaining a used oil processor or re-refiner permit from the Executive Secretary.

5. Maintenance and Spill Prevention.

a. The Permittee shall maintain and operate all used oil associated equipment and facilities to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to air, soil, or surface water which could threaten human health and the environment.
b. The Permittee shall inspect and maintain used oil equipment, tanks, containers, storage units, and transportation vessels on a regular basis to insure compliance with this section.
c. Used oil drips, spills and releases shall be identified and cleaned up immediately, and corrective measures shall be taken to prevent future releases.
d. Used Oil Transfer Facilities are subject to all applicable Spill Prevention, Control and Countermeasures as defined in 40 CFR 112.

6. Record Retention.

The Permittee shall maintain all applicable used oil transfer facility associated records required by R315-15 UAC and all records required by this permit at the location listed in Attachment 1 "General Used Oil Operations," for a minimum of three years. Records may be in hard copy or

electronic format.

7. Rebuttable Presumption/Sampling and Statistical Analysis.
The Permittee shall follow Attachment 2 "Analysis/Rebuttable Presumption," which describes procedures to be used by the Permittee to comply with the analysis requirements of R315-15-4.5 UAC.

8. Prohibited Waste.
a. No quantity of hazardous waste, as defined by R315-1 and R315-2 UAC, or PCBs, as defined by R315-301-2(52) UAC, shall be mixed with used oil by the Permittee.
b. If the transfer facility will be handling any used oil from transformers, including dielectric oil and mineral oil, or any equipment that may include PCBs, the used oil must be tested to determine the PCB concentration and managed as PCB waste if so dictated by the analysis.
c. Used oil shall not be stored in tanks, containers, storage units, and transportation vessels previously used to transport or store hazardous waste unless these tanks, containers, storage units, and transportation vessels have been appropriately emptied and cleaned in accordance with R315-2-7 UAC.

9. Used Oil Transfer, Storage and Management.
a. The Permittee shall only use a used oil transporter with a current used oil transporter permit and a current Used Oil Handler Certificate issued by the Executive Secretary to deliver or collect used oil in quantities exceeding 55 gallons to or from this transfer facility.
b. The Permittee and any used oil transporter delivering to or collecting from the transfer facility shall, at a minimum, follow the specific procedures listed in Attachment 3 "Transfer Procedures" when delivering, collecting or transferring (loading/unloading) used oil at this transfer facility.
c. All used oil deliveries and collections to and from this facility will be documented at the time they occur with a completed bill-of-lading or equivalent document.
d. The Permittee shall transfer, store, and manage used oil using the tanks, containers, storage units, and transportation vessels listed in Attachment 4 "Storage Containers," in the manner described in that attachment, and using the secondary containment units described in Attachment 5, "Secondary Containment."
e. The Permittee may not begin transfer, storage, and management of any used oil in additional tanks, containers, storage units, and transportation vessels until the Executive Secretary has approved the additional tanks, containers, storage units, and transportation vessels including associated procedures and amended this permit in writing.

10. Emergency Controls/Spill Plan.
a. The Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are necessary to protect human health and the environment. The Permittee shall comply with all applicable requirements of R315-15-9 UAC.
b. In the event of a release of used oil, the Permittee shall immediately take appropriate action to minimize the threat to human health and the environment. It shall not constitute a defense, for the Permittee in an enforcement action, that it would have been necessary to halt or reduce the Permittee business activity in order to maintain compliance with the conditions of this permit.
c. The Permittee and any used oil transporter delivering to or collecting from the transfer facility

shall follow the Emergency Controls required by R315-15-9 UAC and the procedures listed in Attachment 6 “Spill Plan.”

11. Used Oil Training.
The Permittee shall follow the training and documentation procedures listed in Attachment 7, “Training.”

12. Waste Disposal.
All wastes generated during used oil operations shall be handled according to procedures outlined in Attachment 8 “Waste Disposal,” and the wastes will be taken to an appropriate facility permitted to handle the type of waste generated.

13. Liability Coverage/Financial Requirements.
a. The Permittee shall maintain general liability coverage for any liability resulting from the Permittee’s operations (e.g., bodily injury property damage) arising from any operations conducted at this Transfer Facility as required by R315-15-10 UAC and Attachment 9 “Liability Coverage.”
b. The Permittee shall maintain third-party environmental pollution liability coverage for accidental spills or mishandlings of used oil and damage to third parties arising from any operations conducted at this Transfer Facility as required by R315-15-17 UAC and Attachment 9 “Liability Coverage.”
c. Changes in extent, type, or amount of the liability coverage or any change in the insurer(s) will be considered a permit modification requiring notification to and approval from the Executive Secretary.
d. The Permittee shall provide the Executive Secretary with documentation before the expiration date of the current general liability coverage and the third-party environmental pollution liability coverage to verify coverage is being maintained and renewed. Documentation of the current general liability and environmental pollution liability coverage is in Attachment 9, “Liability Coverage.”

14. Used Oil Handler Certificate.
a. The Permittee shall pay an annual used oil handler fee by December 31 of each year to obtain a Used Oil Handler Certificate from the Executive Secretary for the subsequent calendar year.
b. In accordance with R315-15-4.1 UAC, the Permittee shall not operate a used oil transfer facility without obtaining and maintaining a current used oil Handler Certificate.

15. Inspection and Inspection Access.
a. Upon reasonable notice from the Executive Secretary, the Permittee shall provide, in Utah, all applicable records of its Utah used oil operations for inspection. Any duly authorized officer, employee, or representative of the Utah Solid and Hazardous Waste Control Board, may have access to and the right to copy any records relating to used oil for the purpose of ascertaining compliance with the applicable provisions of R315-15 UAC and the Used Oil Management Act (19-6-701, et seq.).
b. Any duly authorized officer, employee, or representative of the Utah Solid and Hazardous Waste Control Board, may, at any reasonable time and upon presentation of appropriate

credentials, enter upon and inspect any property, premise, or place on or at which used oil is generated, transported, stored, treated or disposed of, and these officers, employees or representatives may also inspect any used oil operations, transportation vehicles, equipment and associated documents.
c. A record of the inspection may be made by photographic, videotape, electronic or other reasonable means.
d. Where such an inspection involves entry to the Permittee's property, the duly authorized officer, employee, or representative of the Utah Solid and Hazardous Waste Control Board shall provide the opportunity to have a representative of the owner, operator, or agent in charge of the Permittee's facility to be present.

16. Reporting.
As required by R315-15-13.4 UAC, the Permittee shall prepare and submit an Annual Report to the Executive Secretary by March 1 of the following year which shall include the information required by the Annual Report for Used Oil Transporters and Transfer Facilities (Form UO 004). Annual Reports shall include the operational status of the transfer facility until such time cleanup and closure of the facility has been completed.

17. Cleanup and Closure Plan.
a. In the event this facility is no longer operating as a used oil transfer facility, procedures described in Attachment 10 "Cleanup and Closure Plan" will be followed to comply with requirements of R315-15-11 UAC.
b. Any transfer facility changes affecting the Cleanup and Closure Plan shall require approval from the Executive Secretary.

18. Financial Assurance for Cleanup and Closure.
a. The Permittee shall obtain and maintain financial assurance as required to cover costs outlined in the "Cleanup and Closure Plan" and comply with all applicable requirements of R315-15-12 UAC.
b. The minimum required financial assurance amount shall be recalculated annually, at the beginning of each new calendar year, for inflation. If the Permittee's financial assurance amount falls below the newly adjusted minimum coverage, an increase in coverage shall be required to at least meet the new minimum amount. This increased amount shall be due by March 1 of each calendar year.
c. The financial assurance amount in Attachment 11 "Financial Assurance" of this permit, shall need to be increased if a "Cleanup and Closure Plan" modification increases the closure cost estimate above the current financial assurance amount.

19. Other Laws.
Nothing in this permit shall be construed to relieve the Permittee from the Permittee's obligation to comply with any Federal, State, or local law.

20. Transfer of Permit.
This permit may not be transferred to another party or parties without prior written approval of the Executive Secretary.

21. Effective Date.
This permit shall become effective on the date the permit is signed by the Executive Secretary.

Signed _____ Date _____, 2009

Dennis R. Downs, Executive Secretary
Utah Solid and Hazardous Waste Control Board

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ATTACHMENT 1

General Used Oil Operations

The Permittee, or another Utah-permitted used oil transporter operating under a current Utah used oil transporter permit, will transfer used oil between licensed trucks and the Permittee's rail cars at its used oil transfer facility located at 300 West 2650 South. Not more than three rail tanker cars, with a maximum capacity of not more than 27,000 gallons per rail tanker car will be at this location at any one time. Used oil will not be stored in the rail tanker cars for longer than 35 days. The Permittee also transfers liquids collected in secondary containment pans/buckets and used oil containers that are kept by the drivers on their trucks to the used oil tankers.

Prior to transferring used oil into the rail tanker cars, the Permittee will ensure any used oil deliveries will meet the Permittee's current Used Oil Transporter Permit's (UOP-0050) used oil sampling plan (analysis/rebuttable presumption).

Personnel will be trained annually in proper used oil handling procedures. Measures will be taken to prevent oil spills and any accidental spills that may occur will be immediately cleaned up and reported as required.

All used oil transfer and testing records will be maintained for a minimum of three years at the Permittee's facility, located at 1066 S. Pioneer Road, Salt Lake City, Utah.

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ATTACHMENT 2

Analysis/Rebuttable Presumption

The Permittee will follow the used oil sampling (analysis/rebuttable presumption) plan in its current Used Oil Transporter Permit, UOP-0050. In addition, the Permittee shall test each truckload of used oil with a *Clor-D-Tect* test kit prior to that load being transferred to a railcar at this facility unless all used oil to be off loaded into the rail cars by the transporter was tested for halogens at the time of pickup or analysis has been performed by a Utah certified laboratory on the used oil to be off loaded and determined not to be a hazardous waste.

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ATTACHMENT 3

RAIL SITE TRANSFER METHODS

When loading/unloading used oil at this transfer facility, the Permittee shall follow the methods outlined below. The Permittee shall provide trained employees to supervise all loading/unloading of used oil by other used oil transporters at this facility to ensure that proper procedures are followed.

Used Oil Truck Loading and Unloading Methods

1. Driver and any assistant(s) will wear safety glasses, gloves, and other appropriate PPE.
2. Vehicles will be positioned with safety brake applied and wheels will be chocked.
3. Driver will take beginning measurement of used oil in vehicle tank.
4. Complete the *Clor-D-Tect* test, if required (see 'General Operations' and 'Analysis/Rebuttable Presumption' sections above), following the testing procedures listed in its current Used Oil Transporter permit, UOP-0050
5. Hose gaskets will be checked each time prior to connecting the hoses to verify they are sound. After checking, securely tighten hose fittings to minimize potential of spill. Place a drip bucket and/or absorbent below all hose connections when making or breaking connections to catch drips.
6. Connect the hoses to the container to be emptied to the used oil truck and begin moving the used oil from the container into the truck. The operator must remain at the scene, and he/she must remain in charge and maintain control of the operation throughout the entire used oil transfer procedure.
7. After all used oil is pumped, disconnect the hose from truck taking care to ensure that any remaining used oil in the hose is collected and stored appropriately. Clean up any remaining drips, leaks or spills. Before leaving, confirm that container and used oil tank covers are closed and secured.
8. Determine the amount of used oil collected or unloaded.
9. Fill out the bill-of-lading/receipt. Include *Clor-D-Tect* results (if required), and retain a copy at Safety-Kleen's Pioneer Road location.

Used Oil Railcar Loading and Unloading Methods

1. Driver and assistant will wear safety glasses, gloves, and other appropriate PPE.
2. Vehicles will be positioned with safety brake applied, and wheels will be chocked.
3. Ensure the rail car is positioned over the spill containment pans.
4. Take the beginning measurements of used oil in used oil tanker and the rail car.
5. Hose gaskets will be checked each time prior to connecting to verify they are sound. Then, securely tighten hose fittings to minimize potential of spill. Place a drip bucket and/or absorbent

below all hose connections when making or breaking connections to catch any drips.
6. Railcars will be loaded and unloaded from the top opening. One employee must remain at the top of railcar during the entire procedure until all used oil has been transferred if there is more used oil in the used oil truck tank to be transferred than room available in the rail car.
7. The operator must remain at the scene, and he/she must remain in charge and maintain control of the operation throughout the used oil transfer operation.
8. After all used oil is pumped, disconnect the hose from truck and rail car taking care to ensure that any remaining used oil in the hose is collected and stored appropriately. Clean up any remaining drips, leaks or spills. Before leaving, confirm the used oil truck tank covers are closed and secured.
9. Determine amount of used oil collected or unloaded.
10. Fill out the bill-of-lading/receipt. Include *Clor-D-Tect* results (if required), and retain a copy at Safety-Kleen's Pioneer Road location.

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ATTACHMENT 4

STORAGE CONTAINERS

Used oil storage containers at this facility will be limited to three rail tanker cars having a maximum capacity of 27,000 gallons per car. All containers of used oil will be maintained in good condition and clearly labeled with the words "Used Oil".

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ATTACHMENT 5

SECONDARY CONTAINMENT

Safety-Kleen will provide spill containment pans under the rail cars when loading or off loading to catch incidental drips or spills that occur during the transfer process. All liquid collected in the containment system will be removed during the loading/unloading operation that caused it.

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ATTACHMENT 6

SPILL PLAN

The Permittee will follow the emergency spill response procedures below in the event of a used oil spill:

A. If possible, ***stop the source and migration of the release*** (close valve, upright drum, place material in the way to keep the liquid from exiting the site, etc.)**.**

B. Sound the alarm – Let those in the immediate area know there is a spill.

C. Secure the Spill Site
1. Ensure that there is no smoking in the incident area.
2. Prevent access to spill area to keep any one from walking or driving through it.

D. Assess the Situation
1. Estimate the quantity of used oil released.
2. Determine the extent of the contamination from the spill, i.e. did it reach soil, surface water or sewers and what are the approximate dimensions of the contaminated area.
3. Determine if adequate equipment is readily available in the truck spill kit or at the incident site to contain and clean up the released material. If not, include a request for the required supplies when you notify the branch manager.

E. Notify
1. Contact the Safety-Kleen Branch Manager or designee if the spill is in excess of 8 fluid ounces.
2. If the spill is 25 gallons or greater, contact the Utah Department of Environmental Quality, 24-hour Answering Service, 801-536-4123 and follow the requirements contained in R315-15-9.1 UAC.
3. Give notice, if required by 49 CFR 171.15, to the National Response Center, 800-424-8802 or 202-426-2675.

F. Clean Up the Release
Pump out or absorb any free liquids, absorb oil from asphalt/concrete surfaces and remove contaminated materials.

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ATTACHMENT 7

TRAINING

The Permittee shall provide and document spill plan training for the licensed drivers of the transportation and delivery trucks and facility personnel associated with the used oil operation. This training will include identification of used oil, proper loading and unloading procedures, used oil sampling and testing procedures with a *Clor-D-Tect* test kit, spill plan requirements, and personal safety and protection.

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ATTACHMENT 8

WASTE DISPOSAL

All absorbent materials and rags used to clean up minor leaks and spills and wipe off equipment will be collected and stored in appropriate waste containers. Used *Clor-D-Tect* test kits and oily sludge and debris from screens and hoses will be placed in appropriate waste containers prior to shipment to an appropriately permitted facility.

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ATTACHMENT 9

LIABILITY COVERAGE

The Permittee will maintain the general liability insurance coverage required by R315-15-10 UAC and the third-party environmental pollution insurance coverage with the Utah endorsement language required by R315-15-17 UAC. An original signed duplicate or certified duplicate of the policy will be provided to the Executive Secretary along with annual proof of renewal prior to the expiration date.

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ATTACHMENT 10

CLEAN UP AND CLOSURE PLAN

This section describes the procedures to be undertaken to properly cleanup and close the rail facility used to transfer used oil to its final destination in accordance with the Utah regulations for management of used oil (R315-15 UAC).

Overview

The facility is a rail spur where up to three rail tank cars are situated to transfer used oil to an approved processing facility. Containment is provided beneath the rail cars is in the form of metal containment pans which are situated between the rail tracks as well as on each side of the tracks. Facility cleanup and closure activities, as described in this Cleanup and Closure Plan, will be conducted in accordance with applicable regulatory requirements.

Cleanup and closure involves removing the used oil inventory by shipping it offsite and decontaminating and cleaning of containment structures, pipes, and other ancillary equipment. In this case, the rail cars used to accumulate the used oil are situated at an active rail spur and will therefore, be transported offsite by the rail operator to an approved used oil process facility. As part of closure of the facility, the procedures and activities undertaken will be documented and compiled into a cleanup and closure report. If clean up of the facility has defaulted to the responsibility of the Executive Secretary, costs will be included in the closure report. At the time of this approval, the closure costs are estimated to be $80,387, as detailed in Attachment 12 "Closure Cost Estimate.".

Cleanup and Closure of the Used Oil Rail Transfer Facility

This section presents guidelines for closure of the rail car transfer system. Guidelines are presented for the following closure activities:

- Preparation for transport of rail cars for used oil processing;
- Cleaning of ancillary equipment;
- Cleaning of secondary containment structures;
- Proper disposal of material generated during closure;
- Environmental Assessment.

Safety Considerations

In addition to the general safety procedures to clean equipment, the appropriate safety procedures for working in the vicinity of a rail line must also be followed.

Removal of Used Oil Inventory from Site

Rail car tankers will be prepared for transport during facility closure activities. Equipment used to transfer oil from trucks to the rail cars will be removed and the rail car prepared for shipment. The rail cars will be transported in accordance with appropriate regulations and the used oil sent for processing.

Cleaning of Ancillary Equipment

The cost estimate is based on all piping associated with the used oil rail facility being thoroughly flushed with a detergent solution to remove residual oil and subsequently, the appurtenances rinsed with clean water. Following the flush procedures, the equipment will be reserved for use at another site or may be scrapped. The rinse water will be managed as used oil/oily water and transported offsite for proper processing. During the actual cleanup and closure, the piping and other equipment may be transferred to another site to be used in the same service without flushing the interior of the piping or the external surfaces.

Cleaning of Secondary Containment Structures

After the rail cars have been removed from the site, the secondary containment pans situated between and to each side of the track will be cleaned of used oil residue, decontaminated and removed. The cleaning procedures may be performed in place or the pans may be removed and cleaned within a temporary decontamination structure. Cleaning procedures will consist of washing the metal pans with a detergent solution or other appropriate solvents to remove used oil residuals. Following cleaning the pans will be rinsed, if necessary, with clean/tap water. Wash and rinse waters generated during the cleaning operation will be containerized and appropriately managed in accordance with applicable regulations and transported off-site for treatment. Following cleaning, the containment pans will be reserved for reuse at another rail site or may be scrapped. The cost estimate assumes that the pans are decontaminated.

Visual Inspection of Soil and Cleanup of Stained Soils

Inspect the areas between and on either side of the tracks for visual evidence of oil staining. Mark the locations of all stained areas. After soil borings have been taken and the bore holes are filled, excavate stained surface soils and replace them with clean soil.

Management of Materials Generated During Closure

There are a number of materials that will require proper handling during and after closure. These include:

- Used oil and oily water
- Wash and rinse water;
- Surface soil and/or gravel that exhibits residual oil staining; and
- Cleaning equipment, spent rags, absorbents and protective clothing.

As stated previously, used oil and oily water in inventory will be prepared for transport by shipping the rail cars to an appropriate processing facility. Rinse water generated from cleaning ancillary equipment and containment structures will be contained and transported offsite for processing in accordance with applicable regulations.

Equipment used during the closure process will be decontaminated at a temporary decontamination structure or within the secondary pans prior to final cleaning of the pans. Rinse water generated by equipment cleaning will also be containerized and transported offsite for processing in accordance with applicable regulations.

Surface soils or rail ballast gravels may be excavated if areas of the facility exhibit residual oil staining during closure. The surface soils/gravels may be excavated using hand implements or mechanized equipment. The material will be appropriately managed offsite for treatment or disposal in accordance with applicable regulations. If necessary, clean materials may be used for replacement of excavated materials. Disposable equipment and protective clothing utilized during closure activities will be properly containerized and disposed of at an appropriately permitted off-site facility.

Environmental Assessment

1. Install four subsurface soil borings. Boring installation to be completed with Geoprobe type hydraulic push-probe rig. Advance borings to a minimum of 10 feet in depth.
2. Collect continuous core soil samples with the sampling device attached to drill rods from immediately beneath gravel or pavement base to total depth. All samples will be field screened with a PID. Up to four samples will be submitted for laboratory analysis based on field screening results. If elevated PID readings are not observed, samples from zero to two feet and the interval at total depth will be submitted for analysis. Samples collected from the interval at total depth should be submitted to the laboratory on "hold" and analyzed if necessary based on evaluation of results from laboratory analysis of overlying sample intervals.
3. Soil samples submitted to the laboratory will be analyzed for volatile organic compounds using Method 8260, total recoverable petroleum hydrocarbons using Method 1664 and totals for arsenic, lead, cadmium and chromium using Method 6010B. Any equivalent method may be substituted for these based on SW-846 methods or others, either of which must be approved by the Executive Secretary.
4. If ground water is encountered during boring installation, a ground-water sample will be collected through the hydraulic probe rods using a peristaltic pump. A maximum of two locations will be sampled. One of the groundwater sample locations should be from the soil boring that exhibited the highest PID readings.
5. If encountered/collected, ground-water samples will be analyzed for the same parameters as the soil samples.
6. Upon receipt of the analytical data, a brief summary report will be prepared by a consultant.

Closure Report

Closure activities will be described in a closure report. The report will include documentation of the closure process, removal of the used oil inventory, decontamination of equipment and containment structures, excavation of any oil-stained surface soils/gravels, and environmental assessment. If the closure has defaulted to the Executive Secretary, this report will also include closure costs. Notes, photos, and lab analyses may be included as part of the closure documentation.

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ATTACHMENT 11

FINANCIAL ASSURANCE

The Permittee shall obtain and maintain financial assurance as required to cover the costs outlined in the "Cleanup and Closure Plan" and comply with all applicable requirements of R315-15-12 UAC. The minimum required financial assurance amount shall be recalculated annually for inflation at the beginning of each new calendar year. If the Permittee's financial assurance amount falls below the newly adjusted minimum coverage, an increase in coverage shall be required to at least meet the new minimum amount. This increased amount shall be due no later than March 1 of each calendar year. The financial assurance shall also be increased if a modification to the Cleanup and Closure Plan increases the closure cost estimate above the current financial assurance amount.

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ATTACHMENT 12

CLOSURE COST ESTIMATE

Closure Cost Estimate Worksheet for Used Oil Storage Rail Site, Safety-Kleen Systems, Inc. Service Center, Salt Lake City, UT

		Category	Hourly Rate or Unit Charge	Hours or Unit Estimate	Subtotal
1.	**PROJECT COORDINATION AND SCHEDULING (See note a)**				
	Prime Contractor Costs				
	- Obtain subcontractor quotes to implement closure activities	Project Manager	$94	2	$188
	- Coordinate scope and schedule of project activities with owner/operator, decontamination contractor, regulatory agencies and analytical laboratory	Project Manager	$94	4	$376
	- Review facility closure plan	Project Engineer	$94	2	$188
		Field Supervisor	$75	4	$300
	- Prepare project/site specific Health and Safety Plan	Health/Safety Specialist	$94	6	$564
	- Participate in on-site coordination and orientation meeting with owner/operator and decontamination contractor	Project Manager	$94	2	$188
	- Prepare project activity and project status reports	Project Manager	$94	4	$376
	- Office Expenses		$100	1	$100
	- Miscellaneous Expenses		$100	1	$100
	Activity 1. Subtotal				**$2,380**

2. MOBILIZE TO SITE AND PREPARE FOR CLOSURE

Assumptions

- Used Oil facility consists of three rail cars, with maximum rail car volume per load of 27,000 gallons. Assume all three cars are full of oily water (non-hazardous), with no resale value (worst case scenario).
- Used oil/water waste transported to ESI Environmental, Inc. (Indianapolis, Indiana). Unit cost is based on T&D per rail car of $11,546/car. (See notes e & f)
- Estimated rail transportation costs based on RSMeans (See note e)
- Prime Contractor per diem includes rental car, room and meals
- Subcontractor costs include labor and all expenses to complete each task (See note b)
- Total time on site is 1 day for decontamination of equipment and containment structures.

Prime Contractor (See note a)

	Costs					
		- Project Management and Supervision	Project Manager	$94	2	$188
		Mobilize to site/ supervise cleaning of equipment and containment structures	Field Supervisor	$75	10	$750
			Travel	$1,000	1	$1,000
			Per diem	$150	1	$150
	Subcontractor Costs	(See notes b. e & f)				
CP pg 17		- Transport used oil/oily waste to a TSD for treatment/disposal via rail.				
		Estimated treatment/disposal cost (per railcar) at ESI	TSD/per rail car	$11,546	3	$34,638
		Activity 2. Subtotal				**$36,726**
3.	**RAIL CAR CONTAINMENT SYSTEM DECONTAMINATION (Assumes 3 sets of containment pans)**					
	Assumptions:					
CP pg 18	- Containment pans may either be cleaned in place and removed, or removed from the track and cleaned in a purpose built containment structure					
	- Prime Contractor per diem includes rental car, room and meals, and is accounted for in above activity.					
	- Subcontractor costs include labor and all expenses to complete each task					
	Prime Contractor Costs	(See note a)				
		- Project Management and Supervision	Project Manager	$94	2	$188
		- Supervise Facility Decontamination Activities	Field Supervisor	$75	10	$750
CP pgs 18 & 19		- Inspect surface in vicinity of rail car loading area for evidence of spills/leakage	Field Supervisor	$75	2	$150
CP pgs 18 & 19		- Decontaminate ancillary equipment and 3 sets of rail car containment pans	Field Staff	$75	10	$750
		Wash/triple rinse piping and containment with high pressure spray	Equipment	$500	LS	$500
		Remove wash/rinse water, containerize in drums Cost for transportation and wash water disposal included below	Per diem	$150	1	$150
CP pgs 18 & 19		- Excavate surface soils or gravels with residual oil staining	Field Staff	$75	10	$750
		Excavate surface soils using hand tools to remove areas that exhibit minor oil staining. Assumes excavated material is placed in drums and transported offsite for disposal (assumes no more than 3 drums of excavated material) Cost for transportation and wash water disposal included below	Equipment	$500	LS	$500
			Per diem	$150	1	$150
		Activity 3. Subtotal				**$3,888**
4.	**DECONTAMINATE CLEANUP EQUIPMENT (If Necessary)**					
	Assumptions:					
CP pg 17 & 18	- Decontamination of Cleanup Equipment is not anticipated to be necessary. Equipment used to remove waste units will only be used following decontamination of the unit Equipment such as pressure washers or excavating implements will be cleaned during decontamination of each unit (equipment will not contact hazardous waste).					

CP pg 17 & 18	- If performed, washing of cleanup equipment shall consist of a high-pressure detergent/water solution and triple rinsing with tap water				
	Prime Contractor Costs (See note a)				
	- Construct decon area with 6ml plastic sheeting and 4" absorbent berm	Field Supervisor	$75	4	$300
	- Decontaminate cleanup equipment	Equipment/supplies	$1,000	LS	$1,000
		Per diem	$150	1	$150
	Assumes decontamination with detergent/water solution, and scrubbing with brooms, mops, etc., and triple rinsing with high pressure spray. Wash/rinse water containerized and transferred to drums Cost for transportation and disposal of drums included below.				
	Activity 4. Subtotal				**$1,450**
5.	**CONTAINERIZE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES**				
	Assumptions: - 300 gallons wash water generated from decontamination of equipment and containment pans in 5 drums - 50 gallons wash water from decontamination of cleanup equipment in 1 drum - 3 drums of excavated soils managed as non-haz based on characterization results - Waste characterization samples not necessary for wash/water disposal (wash water from used oil reclamation facilities disposed as oily waste) - 50 gallons of ground water collected during ground water sampling (1 drum)				
	Prime Contractor Costs				
CP pg 18 & 19	- Coordinate pick up and disposal	Project Manager	$94	2	$188
		Field Supervisor	$75	4	$300
	- Transportation excavated soils and wash water ($25/drum - $250 min) (See note d)	Transportation	$25	9	$250
	- Disposal of wash water ($150/drum) (See note d)	Drum disposal	$150	7	$1,050
	- Disposal of non-hazardous petroleum contaminated soil in drums (See note d)	Drum disposal	$80	3	$240
	Activity 5. Subtotal				**$2,028**
6.	**ENVIRONMENTAL SITE ASSESSMENT (See note a) (CP pg 19)**				
a.	Project Coordination and Scheduling	Level 1	$130	1	$130
	- Coordinate scope and schedule with S-K and subcontractors	Level 3 - Project Mgr	$94	8	$752
	- Prepare project activity and status reports	Level 4 - Field Supervisor	$75	4	$300
	- Health and safety stewardship, including preparation of site specific health and safety plan and job safety analyses (JSAs)	Drafting	$65	2	$130
		Clerical	$45	2	$90
		Subtotal - Labor			$1,402
		Office	See Note (f)	0.025	$35
		Miscellaneous	Cost	1	$150

		Subtotal - Expenses			$185
		Activity a. - Total			**$1,587**
b.	Conduct Environmental Assessment	Level 1	$130	1	$130
	- Notify utility locate service prior to drilling activities	Level 3 - Project Mgr	$94	2	$188
	- Observe and document installation of 4 soil borings to a total depth of 10 ft-bgs	Level 4 - Field Supervisor	$75	24	$1,800
	- Collect 8 soil samples (2 per boring) for analysis of TRPH (Method 1664), Total Metals for As, Pb, Cd & Cr (Method 6010B)	Clerical	$45	2	$90
	VOCs (Method 8260)				
	- Collect 2 groundwater samples (if groundwater is encountered) and submit for analysis of TRPH (Method 1664), Total Metals	Labor			$2,208
	for As, Pb, Cd & Cr (Method 6010B) & VOCs (Method 8260)	Equipment	See Note (f)	1	$800
	- Document site activities through photographs, borehole logs, and field notes	Travel	Cost	1	$700
	- Observe borehole abandonment	Per Diem	$160	3	$480
		Office	See Note (f)	2.5%	$55
	Assumptions:	Miscellaneous	Cost	1	$400
	- Estimate based on a similar investigation conducted in Luverne, Minnesota (February 29, 2008)				
	- Boreholes will be spaced equidistant over the length of the leased section of the track either between the rails	Expenses			$2,435
	or immediately next to the rails				
	- Boreholes will be sampled continuously and screened using a PID	TestAmerica	See Note (b & g)	6	$1,962
	- Soil samples will be collected from intervals with the highest PID reading or from 0-2 and 8-10 ft below ground surface	Driller	See Note (g)	1	$1,440
	- S-K will manage drums of waste generated during drilling/sampling activities				
	- Soil borings will be completed with a 2-inch direct push (Geoprobe)	Subcontractors			$3,402
	- Miscellaneous costs includes sample shipment				
	- Baseline assessment activities may be completed in 2 onsite days due to utility location activities one day				
	prior to soil boring activities				
	- Groundwater samples will be collected through the hydraulic probe rods using a peristaltic pump				
	- Groundwater recharge will be sufficient to collect samples during site visit and a second mobilization will not be necessary				
	- Analytical services will be performed with a standard turn around time				
	- Sampling equipment will include PID, water quality, oil/water interface probe and peristaltic pump	**Activity b. - Total**			**$8,045**
c.	Prepare Environmental Assessment Summary Report	Level 1	$130	2	$260
	- Prepare summary tables and figures	Level 3 - Project Mgr	$94	2	$188
	- Analyze soil and groundwater results relative to applicable standards or screening values	Level 4 - Field Supervisor	$75	24	$1,800
	- Incorporate photo documentation into summary report	Drafting	$65	5	$325
		Clerical	$45	2	$90
		Labor			$2,663
	Assumptions:				
	- Environmental Assessment summary will be presented in a letter-style report	Office	See Note (f)	0	$67

- No data validation will be required	Miscellaneous	Cost	1	$150
	Expenses			$217
	Activity c. -Total			**$2,880**
Activity 6. Subtotal				**$12,512**

7. CLOSURE CERTIFICATION REPORT (See note a)

CP pg 20

Prime Contractor Costs

- Compile field notes, documentation and photographs	Project Manager	$94	2	$188
	Project Engineer	$94	4	$376
- Draft Closure Certification Report	Project Manager	$94	4	$376
	Project Engineer	$94	12	$1,128
- Prepare closure certification statement	Project Principal	$142	2	$284
- Office Expenses	Drafting/Clerical	$400	1	$400
- Miscellaneous Expenses	Copying/Postage	$100	1	$100
Activity 7. Subtotal				**$2,852**

COST ESTIMATE ACTIVITIES SUMMARY

1.	PROJECT COORDINATION AND SCHEDULING (See note a)		$2,380
2.	MOBILIZE TO SITE AND PREPARE FOR CLOSURE		$36,726
3.	RAIL CAR CONTAINMENT SYSTEM DECONTAMINATION (Assumes 3 sets of containment pans)		$3,888
4.	DECONTAMINATE CLEANUP EQUIPMENT (If Necessary)		$1,450
5.	CONTAINERIZE, TRANSPORT AND DISPOSE OF DECONTAMINATION WASTES		$2,028
6.	ENVIRONMENTAL SITE ASSESSEMENT		$12,512
7.	CLOSURE CERTIFICATION REPORT		$2,852
	SUBTOTAL CLOSURE COST ESTIMATE		**$61,836**
	DEQ OVERSIGHT		
	CONTINGENCY	10%	$6,184
	CONTINGENCY	20%	$12,367
	TOTAL CLOSURE COST ESTIMATE		**$80,387**

Notes:

a. Prime Contractor Rates obtained from Trihydro Corporation 2008 Schedule of Charges, Laramie, WY

b. Laboratory Subcontractor Rate Obtained From Test America Pitsburgh PA

c. Drummed waste treatment/disposal unit cost obtained from Clean Harbors Grassy Mountain, Utah Facility.

d. Rail transportation costs based upon RS Means

e. Oily water disposal costs based upon quote from ESI Environmental, Inc.

Activity	Cost	Unit
Per Rail Car Rate from SLC to ESI, Indianapolis, IN	$8,846	/load
Maximum Rail Car Volume per Load	27,000	gal/load
Distance from SLC to ESI (note: road miles)	1550	mi.
Disposal Cost at ESI: Oily Wastewater	$0.10	/gal
Total T&D per Rail Car	$11,546.00	
Total T&D per Gallon	$0.43	
Total T&D per Mile	$7.45	

f. All work will be performed in accordance with Trihydro Corporation Schedule of Charges.

g. Assumes costs are a direct bill to client.